

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. G-22-7

DALE FELIX BONNETTE

UNOPPOSED MOTION FOR CONTINUANCE

The Defendant, Dale Felix Bonnette, moves this Court for a 90-day continuance of the motions deadline, pretrial conference and trial, and respectfully shows as follows:

Mr. Bonnette is charged with wire fraud in violation of 18 U.S.C. § 1343. This Honorable Court issued a scheduling order establishing a series of deadlines and settings for the proceedings in this matter, to wit: The pretrial motions deadline was set for September 9, 2022; whereas the pretrial conference is set for November 17, 2022. Lastly, trial is set for December 5, 2022.

Discovery in this case is ongoing, and undersigned counsel is engaged in both legal and factual investigations. Undersigned counsel has identified certain legal and factual issues that require further investigation. Accordingly, must plead for additional time to complete those investigations and analysis before deciding on a

need to file pretrial motions, and to prepare for trial, if necessary. Moreover, additional time is needed to discuss the case with Mr. Bonnette.

Dale Felix Bonnette respectfully submits that the best interests of justice served by granting this motion for a continuance substantially outweigh the interests of the defendant and the community in a speedy trial, and that failure to grant the continuance would deprive defense counsel of sufficient time to prepare for trial.

The government is unopposed to this Motion for Continuance.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas No. 3233
Texas State Bar No. 14003750

By /s/ Alex Rosa-Ambert
ALEX ROSA-AMBERT
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney John Lewis and determined that the United States is unopposed to this motion for continuance.

s/ Alex Rosa-Ambert
ALEX ROSA-AMBERT

CERTIFICATE OF SERVICE

I certify that on November 3, 2022, a copy of the foregoing Unopposed Motion to Continue was served by Notification of Electronic Filing and was delivered by email to the office of Assistant United States Attorney John Lewis.

s/ Alex Rosa-Ambert
ALEX ROSA-AMBERT